

RJIL/TRAI/2017-18/465
29th September 2017

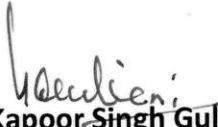
To,
Sh. S.T. Abbas
Advisor (NSL)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, New Delhi 110002

Subject: Comments on Draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2017 dated 16.08.2017.

Dear Sir,

Please find enclosed herewith comments of Reliance Jio Infocomm Ltd. on Draft Telecommunication Mobile Number Portability (Seventh Amendment) Regulations, 2017 dated 16.08.2017.

Thanking you,
For **Reliance Jio Infocomm Limited**,


Kapoor Singh Guliani
Authorised Signatory



Enclosure: as above.

**RELIANCE JIO INFOCOMM LTD'S (RJIL) Comments on TRAI's
Draft Telecommunication Mobile Number Portability (Amendment) Regulations, 2017**

1. At the outset, we thank the Authority for issuing this draft Amendment to discuss on the measures to reduce the rejection of porting requests due to mismatch in Unique Porting Code (UPC) and expiry of UPC, and to streamline the process for Non Payment Disconnection (NPD) initiated on the instance of the Donor Operator (DO). We also welcome the Authority's initiative to seek stakeholder's inputs on other issues for improving the Mobile Number Portability (MNP) process.
2. We agree with the Authority's proposed solution to reduce and eliminate the porting rejection on account of mismatch in UPC and expiry of UPC. We understand that the proposed process will bring much needed transparency in the porting process and will help address the unnecessary disconnect and dissatisfaction amongst subscribers. As the Authority has pointed out these two grounds of rejection are the most used, it is appropriate and timely to address the same.
3. We submit that the draft amendments to Regulation 8 and 9 of the principal regulations providing for the simultaneous availability of the UPC and date of expiry of UPC along with the mobile number of the porting subscriber with the MNP Service Provider (MNPS) and the real time communication regarding the correctness and validity of the UPC will bring about the much needed transparency to the entire process and would provide a timely opportunity for correction in case of any inadvertent errors in submitting the UPC. We submit that this solution is very much feasible and the Authority should give sufficient time to the service providers to implement this solution.
4. Further, we submit that the Authority's draft amendment to Regulation 14 of the principal regulations designed to address the issues pertaining to requests for NPD are also a welcome addition. This measure will provide more clarity in this aspect and will help address consumer grievances on disconnection.
5. The current prevailing MNP Regulations were framed in 2009, with further revisions in the Bulk customer porting regulations in 2013. The MNP Regulations are in operation for over 6 years now. Although there have been some amendments to address the emergent operational issues, but the Regulations on the whole have not kept pace with the fast changing market realities. We would like to take this opportunity to suggest further consumer and industry friendly changes in the MNP Regulations, as discussed herein below:

A. Timelines of the porting process

1. We submit that the first and foremost change required is in reducing the timelines for effecting the porting requests. The current 7 day timeline is too long in comparison with the international standards, where the porting requests are completed in a matter of minutes or a few hours. Such long 7 day timeline causes undue hardships to subscriber who has already decided to avail MNP and move to another network. This



difficulty becomes more acute when the consumer is seeking to port out due to non-availability of the network or the quality of service.

2. The largest time line of 4 days has been provided for Donor Operator to verify the details of Porting request and communicate it to MNPS. Initially, in Regulation 10 of the Principal Regulations i.e. "The Telecommunication Mobile Number Portability Regulations, 2009(8 of 2009)" dated 23rd September, 2009, the Authority stipulated '24 hours' period for Donor Operator to verify the details of Porting request and communicate it to MNPS. However, vide second amendment dated 24.11.2010 this time period of 24 hours was modified to 4 working days due to the request by DOT citing security reasons, and accordingly, the total time period for porting became 7 working days. The relevant Para 4 of the explanatory memorandum to the Amendment dated 24.11.2010 is reproduced below for ready reference:

"4. The modification in the timelines (from 24 hrs to 4 working days) for Donor operator in the regulation 10 of the principal regulations has been necessitated due to the request by DoT citing security reasons. With this amendment to the principal Regulation, the maximum time period for porting would become seven working days except in Jammu & Kashmir, Assam and North East licenced service areas, wherein it would be 15 working days."

At that time Centralised Monitoring System was not implemented and therefore, intimation to Lawful Interception Authorities was required to be provided manually. Now with the implementation of Centralised Monitoring System, this intimation is almost instantaneous and there is absolutely no necessity for keeping 4 days for this purpose.

3. It is further submitted that when these Regulations were notified in 2009, most of the processes including subscriber enrolment, verification were manual. Now all the processes are automated and Aadhaar based eKYC for subscriber enrolment and verification is also implemented by all TSPs across the country. Therefore, the large timelines provided in the Regulations, which is anti-consumer, needs to be eliminated. In the present circumstances, porting can be done almost instantaneously and should be mandated to be completed on the same day preferably within a period of 2 to 4 hours, in line with the best International Practices.
4. It is, therefore, requested that the maximum time period of 7 working days provided in the regulations for completion of MNP activity may kindly be reviewed forthwith and the revised time line as submitted above may kindly be prescribed.

B. Porting of Corporate connections

1. Another area of improvement is in the realm of porting of corporate connections. The Corporate connections are by definition the connections owned and paid for by the Corporate with no individual ownership of mobile numbers. Therefore the decision on



the porting of such connections would also be a corporate decision, therefore one UPC for all corporate porting connections should be sufficient.

2. The Authority in the 5th amendment to MNP Regulations dated 22.07.2016 had discussed the issue of providing Corporate MNP on a single UPC generated by the Authorised Signatory of the company, however it did not implement the same as this required a change in the existing framework, where the UPC for the porting should be generated only by the porting mobile number. We submit that as the Authority is looking at the revisions in MNP regulations, this option may also be re-evaluated and implemented.
3. The current subscriber verification instructions do not put a limit on the number of subscribers for a corporate customer, therefore all the required connections can become subscriber at one go under a single CAF, however the MNP limitation of the 50 numbers at one go puts unreasonable restrictions on a corporate seeking to move its connections to another service provider.

C. Operational issues with Bulk Porting requests

1. There are many issues still being faced in the bulk porting process. The limit of 50 numbers imposed on a single porting request was implemented in order to ensure that there are no errors in the feeding the numbers, however it has in fact become a major pain point for the Bulk porting requests by larger groups.
2. The faulty and arbitrary implementation of this provision by the Donor operators leading to rejection further causes confusion to the proceeding. Sometimes a request for all numbers is rejected for even one UPC mismatch or outstanding against one number. Thereby leading to a situation where the porting by a large corporate becomes a humongous exercise, stretching into many months. The only party that really suffers in this case is the Corporate that wanted to port out, for a long period of time it is required to bear with the services of the Donor operators for no fault.

D. Process for cancellation of porting request

1. As per the current prevailing regulation 13 of the MNP Regulations, in case the subscriber wishes to cancel the porting request, he is required to inform about his decision only to Recipient operator (RO) within 24 hours of submitting the porting request. This leads to huge process gap, where the responsibility of cancelling the porting request lies with the party most benefitted by the porting, i.e. the RO. This, obviously, leads to a faulty implementation and customer dissatisfaction.
2. Further, there are no checks and balances in place to ensure transparency and scrupulous conduct by the RO and to ensure compliance with the Regulations. The current framework is ripe for possible abuse which leads to misgivings and apprehensions in DO, as DO itself has no role to play in cancellation of the porting request.



3. We submit that the Authority should initiate a process to streamline the withdrawal of porting request by introducing a SMS based withdrawal process. Under this process the subscriber wishing to withdraw porting request should send a cancellation SMS with predefined prompt code to a predefined short code to both DO and RO, within 24 hours of requesting the port out. The DO should be required to submit this SMS alongwith the mobile number and UPC to the MNPSP on real time basis. MNPSP should reject the porting requests basis this SMS, with an intimation to the RO. DO would be required to maintain logs of such cancellation requests received and forwarded to MNPSP for a period of three months from date of receipt of request for cancellation from subscriber. Further, as and when the porting process is reduced the timelines of withdrawal should also be reduced accordingly.

E. Retention efforts by the DO

Another interlinked issue that needs urgent attention pertains to the thriving practice of retaining the porting out subscribers by offering lucrative benefits by some service provider, in complete breach of MNP regulations and Tariff regulations. The Authority must take strong note of such actions by TSPs and penalise them appropriately. The cases of genuine withdrawal of porting request can be easily separated from the retention cases by examining the tariff plans applied for these subscribers.

F. Issues faced in updation of reassigned number series

1. We have observed that when a mobile number series previously assigned to an operator in one LSA is reassigned to another operator in a different LSA post surrender of series by the previous operator. The Number range holder (NRH) details like Operator ID (OID) and licensed service area (LSA) are updated with the MNPSP and service provider's number portability gateways (NPGW). The number series is also updated with new LRN as per the DoT letter. However, the complete NRH details are not updated for the already ported mobile numbers with the MNPSPs.
2. For such numbers when a port broadcast is received with MODIFY command with NRH (OID, LSA) and current (OID, LSA) operator parameter values, there is a mismatch in port updating logic (which matches current OID and LSA with NRH OID and LSA) at NPGW since NRH LSA value is still reflecting as old operator LSA and cannot be validated from broadcasted values since NRH LSA is not sent as a broadcast parameter leading to a delayed or rejected transaction.
3. We submit that this issue can be easily averted by ensuring that any change in Number series is intimated to MNPSP along with the service providers simultaneously. Further, all changes in the ported database should be broadcasted by the MNPSP post making all necessary changes in its ported subscriber database to all service providers, for uniformity in operator Databases. Additionally both the NRH OID and LSA should be broadcasted with MODIFY command, post making necessary changes in the ported



number database with MNPSPs. This will help ensure that the subscribers do not face unnecessary hardships. Another interconnected issue is of a few never-ported, active numbers being still with the original assignee of the series at the time of reallocation of the series. The necessary suitable changes in the MNPSP database and broadcast in similar manner as in the above mentioned case will help resolve this issue as well.

G. Operational issues faced in Number return process

1. We have observed a few cases where a temporary issue at service provider's end led to deactivation/deletion of a ported subscriber's number. In such a scenario, if MNPSP sends a broadcast of number return to all service providers then there is a possibility of subscriber losing his number permanently and he may be forced to reactivate the same number with NRH to retain the number. Generally, such issues are resolved post DoT approval and manual changes made by the service providers, however this impacts the incoming call facilities for the subscribers till all service providers have updated the database. Further, this exposes the service provider's system to manual intervention and associations issues. However, this can be easily averted if the changes in ported subscriber Database are initiated by the MNPSP post applicable DOT approval instead of offline updates.
2. We would also highlight the fact that the number return process is not well defined for the service providers, whose licenses have been cancelled/expired. As per the existing process, on a number return request, the numbers are returned to the Original NRH. However, there is a possibility of a wrong number return request initiated by RO and if the number belongs to a licensee with cancelled/expired license and the numbers are currently not allocated to any other service provider then it is not possible to get that number back. We suggest that in such cases MNPSP should support re-Broadcast of the number to all service providers post DOT approval provided by RO to help the aggrieved subscribers.
6. We hope that Authority will consider our aforementioned submissions before taking final decision on this matter.

